

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

**VAUGHN PERRET, CHARLES
LEARY & DANIEL ABEL, D/B/A
TROUT POINT LODGE LTD OF
NOVA SCOTIA & IN THEIR
INDIVIDUAL CAPACITIES,
PROGRESS MEDIA GROUP
LIMITED, MARILYN SMULDERS,
TORSTAR CORPORATION,
NATIONAL GEOGRAPHIC
SOCIETY INC., XYZ FOUNDATION
& JOHN DOES 1-50**

DEFENDANTS

MOTION FOR EXTENSION OF TIME

COMES NOW Defendant, National Geographic Society (“NGS”), by and through its undersigned counsel of record, and files this its Motion for Extension of Time to file its Reply in Support of its Motion to Dismiss and in support thereof would show unto the Court as follows:

1. NGS filed its Motion to Dismiss in this cause on January 5, 2016.
2. Plaintiff, Douglas Handshoe, filed his Response in Opposition to the Motion to Dismiss on January 22, 2016.
3. NGS’ Reply in Support of its Motion to Dismiss is currently due to be filed on January 29, 2016.
4. Due to the inclement weather in the Northeast and counsel for NGS’ current inability to cohesively work on the Reply in various locations, NGS respectfully requests an additional three (3) days in which to file its Reply or by no later than February 3, 2016.
5. Plaintiff has been contacted and has no objection to said extension.

WHEREFORE, PREMISES CONSIDERED, Defendant, National Geographic Society, respectfully requests this Honorable Court grant its Motion for Extension of Time and allow NGS an additional three (3) days or by no later than February 3, 2016 to file its Reply in Support of its Motion to Dismiss.

Respectfully submitted, this the 27th day of January, 2016.

NATIONAL GEOGRAPHIC SOCIETY

/s/ Jonathan P. Dyal

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*Attorneys for Defendant National Geographic
Society*

CERTIFICATE OF SERVICE

I, the undersigned counsel, do hereby certify that I have this day electronically filed the foregoing with the Clerk of Court using the ECF system, which sent notification of such filing to all counsel of record who have registered with the ECF system.

This the 27th day of January, 2016.

/s/ Jonathan P. Dyal
Of Counsel